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DEPOSITION OF SCOTT BOYHER
TAKEN ON BEHALF OF THE PLAINTIFFS
NOVEMBER 21, 2018

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12 (The exhibit was retained by Ms. Steffan.)

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11 DEPOSITION OF SCOTT BOYHER, produced, sworn,
and examined on the 21st day of November, 2018,
12 between the hours of 9:15 a.m. and 11:30 a.m. of
that day, at St. Louis City Hall, 1200 Market
13 Street, St. Louis, Missouri 63103, before AMANDA N.
FARRAR, a Certified Court Reporter of the State of
14 Missouri.

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APPEARANCES

For the Plaintiffs:

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1 (The deposition commenced at 9:15 a.m.)

2 SCOTT BOYHER,

3 of lawful age, being produced, sworn, and examined
4 on behalf of the Plaintiffs, deposes and says:

5 DIRECT EXAMINATION

6 BY MS. STEFFAN

7 Q. Good morning, Lieutenant Boyher.

8 A. Good morning.

9 Q. If you could, please, say and spell your
10 name for the record first.

11 A. Scott Boyher, B-O-Y-H-E-R.

12 Q. And the court reporter introduced me,
13 but I'm Jessie Steffan. I am attorney for the
14 plaintiffs in the case Ahmad vs. City of St. Louis.

15 Have you ever been deposed before?

16 A. Yes.

17 Q. So I assume you're familiar generally
18 with the ground rules. It's important to speak
19 audibly so that the court reporter can take down the
20 record. If you answer a question, I will presume
21 that you understood the question. So if you don't
22 understand the question, you should say something
23 and I will attempt to restate. And you can also
24 take a break at any time as long as there's not a
25 question hanging out there in the air. If that's

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1 A. Yeah.

2 Q. Have you personally sent any emails in
3 which you describe the police response to the
4 Stockley verdict protests?

5 MR. WHEATON: Objection; form.

6 A. Can I have that one more time?

7 Q. (By Ms. Steffan) Sure.

8 Have you sent any emails in which you
9 discuss or describe the police response to the
10 Stockley verdict protests?

11 MR. WHEATON: Same objection.

12 A. Not that I'm aware of.

13 Q. (By Ms. Steffan) Have you received any
14 emails in which the police response to the Stockley
15 verdict protests has been discussed?

16 A. Not that I'm aware of.

17 Q. Considering the police response to the
18 Stockley verdict protest as a whole, would you do
19 anything differently than you did then today if the
20 same events occurred?

21 MR. WHEATON: Objection; form,
22 foundation, calls for speculation.

23 A. I don't know.

24 Q. (By Ms. Steffan) Are you aware that the
25 court issued a preliminary injunction in this case?

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1 A. Yes, ma'am.

2 Q. How did you find out about that?

3 A. At a meeting.

4 Q. A meeting of who?

5 A. A meeting in headquarters.

6 Q. So command staff; is that accurate --

7 A. Yes.

8 Q. -- to say?

9 A. Command staff.

10 Q. To the best of your understanding, what
11 does the preliminary injunction tell you about what
12 you should do differently in your day-to-day
13 actions?

14 MR. WHEATON: Objection; form and
15 foundation, calls for speculation. A preliminary
16 injunction order speaks for itself.

17 A. I don't know.

18 Q. (By Ms. Steffan) Do you do anything
19 differently when you're patrolling today as opposed
20 to before the preliminary injunction was issued, as
21 a result of the preliminary injunction?

22 MR. WHEATON: Objection to form. It's
23 vague.

24 A. Not to my knowledge.

25 MS. STEFFAN: Can we go off the record a